

REMARKS

Claims 116-162 are pending in the application.

Claims 116-162 have been rejected.

Claims 116, 118, 121, 122, 128, 130, 133, 134, 137, 142, 143, 146, 148, 151, 152, 155, 157, 160, and 161, have been amended. No new matter has been added. The amendments to dependent claims 118, 121, 122, 130, 133, 134, 142, 143, 148, 151, 152, 157, 160, and 161, have been made for clarification purposes only; these amendments are not made for any purposes related to patentability. Support for the amendments to independent claims 116, 128, 137, 146, and 155, can be found, at least, within lines 13-18 on page 23. Further support for claim 116 can be found, at least, within lines 10-14 on page 7.

Examiner Interview

Appreciation is expressed for the telephonic interview conducted on February 13, 2009 between Examiner Harper and Samuel G. Campbell III, Applicants' attorney (Reg. No. 42,381). During the interview, the Pederson reference (U.S. Patent No. 5,864, 842) was discussed with reference to the independent claims. While no agreement was reached during the interview, the undersigned believes this paper is in harmony with the positions expressed during the interview.

Rejection of Claims under 35 U.S.C. § 102

Claims 116-163 stand rejected under 35 U.S.C. § 102(b) as purportedly being anticipated by U.S. Patent No. 5,864,842, issued to Pederson et al. ("Pederson"). Applicants respectfully traverse this rejection.

Amended independent claims 116, 128, 137, 146, and 155 contain limitations similar to:

generating, using a processor, a set of SQL statements to query a first table and a second table, wherein
the first table and the second table are stored in a computer-readable storage medium, and
the generating uses a relationship between the first table and the second table to construct the set of SQL statements, and
the set of SQL statements comprises SQL statements other than a statement that joins the first and second tables;
querying the first table using the set of SQL statements to produce a first result set, wherein
the querying the first table is performed using the processor;
querying the second table using the set of SQL statements to produce a second result set, wherein
the querying the second table is performed using the processor, and
the querying the first table and the querying the second table are performed without joining the first table and the second table; and
joining, using the processor, the first result set and the second result set to produce a third result set.

See, e.g., claim 116 (as amended) (emphasis added). Applicants submit that Pederson fails to teach or suggest, at the very least, querying a first table and querying a second table without joining the first and second tables.

Pederson is focused on improving the performance of a star join operation by means of an efficient partitioning and parallelization of the originally input star join operation. *See* Pederson, Abstract. To this end, Pederson presents a method for performing a SQL star join operation that takes as input a base table and a plurality of dimension tables, and splits the original star join into a plurality of hash star joins. *See* Pederson, Abstract. Pederson then takes the input base table and dimension tables and partitions the tables among various access module processor (AMP) nodes. *See* Pederson, 4:29-34. An AMP node is a component processor of a massively parallel processor (MPP) on which the original star join operation will be executed. *See* Pederson, 3:9-18. In addition to the partitioning and assignment of the input base table and dimension tables among the AMP nodes, each AMP node will perform a subquery on the AMP node's respective table partitions. *See* Pederson, 4:29-34. Each subquery assigned to an AMP

node comprises a hash star join operation. *See* Pederson, 6:31-33 and 6:46-49. Thus, the original star join operation is a join operation, the hash star join operation, and the join operation(s) in each subquery are join operations.

The Office Action's position is apparently that a subquery performed by an AMP node in Pederson is analogous to the claimed querying of the first and the second tables. This analogy fails because the subquery performed by each of Pederson's AMP nodes comprises a "join operation." A hash star join operation is a type of join operation, as are the join operations which effect the hash star join operation. By contrast, the claimed querying of the first and second tables explicitly avoids joining the first and second tables, and so cannot comprise a join operation. This is evidenced by the fact that the claimed querying is performed without joining the first and second tables. No other analogy is apparent to the Applicants.

The attempted analogy of Pederson's subquery to the claimed querying is therefore unsustainable because Pederson fails to teach or suggest querying a first and second table without joining a first and a second table. Pederson's failure to teach this element is a direct result of Pederson's subquery comprising a "join operation." *See* Pederson, 6:23-61.

Further, the join operations performed by the subqueries in Pederson produce result tables, which are then merged into a final result table. *See* Pederson, 6:54-61. Pederson's system cannot operate without the subqueries disclosed therein including join operations. In the claimed invention, as noted, the querying of the first and second tables produces first and second result sets without performing a join operation. Moreover, in the claimed invention, the "joining" performed is done after the querying of the first and second tables (as evidenced by the joining being performed on the result sets of the querying of the first and second tables). Contrary to Pederson, the claimed querying of the first and second tables that produce the first and second result sets does not employ a join operation.

For at least these reasons, Applicants submit that Pederson does not provide disclosure of all the elements of independent claims 116, 128, 137, 146, and 155, and all dependent claims therefrom, and that these claims are in condition for allowance.

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Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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